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Attorneys for Debtor...
P & M Samra Land Investments, LLC

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION

IN RE:)	Case No: 2015 – 29136-A-12
)	
P&M SAMRA LAND INVESTMENTS, LLC)	DCN: JPJ - 2
)	
Debtor and Debtor-in-Possession.)	OPPOSITION TO TRUSTEE
)	JAN P. JOHNSON’S TO DISMISS
)	CASE BASED ON DEFAULT
)	UNDER CONFIRMED PLAN

Debtor P & M SAMRA LAND INVESTMENTS, LLC of Nicolaus, California
by and through their undersigned attorney, hereby submits this Opposition to Trustee
Jan P. Johnson’s Motion to Dismiss Case Based on Default Under Confirmed Plan, as follows...

Your Honor, there is no need to dismiss this case; please do not.

The reality is that every penny of Debtor’s corn income, by agreement, goes directly to
First Northern Bank until its loan is satisfied; this has been the case since November
with satisfaction expected in the next few weeks.

1 The Debtor is requesting a 2 month §1229 adjustment to its
2 payment timeline during which time its coffers will be flush once more and its payment arc
3 will be back on track.

4 To wit, Debtor is wanting to shift all December 2017 payments to March 26, 2018 and
5 if for some reason Debtor misses any of the rescheduled payments, it will dismiss its Chapter 12
6 on its own motion; yet such an event will not occur as the circumstances are as such...

- 7
- 8 a. Although Debtor missed its December 2017 payments prior to that deadline it had
been making its regular payments.
 - 9 b. Although Debtor has a \$1 mm fulfillment contract for organic corn, due to delays in
10 tilling and planting, it is just now getting the majority of that corn to the buyer; and
11 commensurately satisfying the \$425,000 + operating loan from First Northern Bank
which by agreement has to receive all corn income...first, until loan satisfied.
 - 12 c. Within the next 3 – 4 weeks, Debtor will have access to both corn income above that
13 which had to be directed to the bank as well as new funds from the 2nd First Northern
operating loan; projected to be valued at around \$750,000.
 - 14 d. Furthermore, First Northern Bank has gotten behind the Samra Family to the point that
15 it's that bank's intention to refinance the Nicolaus property which would of course
16 render the moot the need for the Chapter 12.

17 Under separate cover the Debtor has submitted a request under **11 U.S.C. 1229**.

18 Accordingly, Debtor respectfully requests that this Court not dismiss this case
19 and allow Debtor the opportunity to modify its Chapter 12 payment obligations.
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Respectfully Submitted,

Dated: January 22, 2018

LAW OFFICES OF NOEL KNIGHT

By: /s/ Noel Knight

Noel Knight

Attorney for the Debtor P & M Samra

Land Investments LLC